

REMARKS

Claims 1-41 are currently pending in the present application. In an office action dated March 30, 2004, claims 1-13, 16-17, and 19-41 were rejected and claims 14, 15, and 18 were objected to. In the present response, Applicants amend claims 22, 26, and 27, cancel claims 24, 29, and 30, and traverse the rejections as follows.

Rejections under 35 U.S.C. 102

Claims 1-6, 8-13, 16, 17, 19-33 and 35-41 were rejected under 35 U.S.C. 102(e) as being anticipated by Angwin et al. (WO 00/41416). It was alleged that Angwin teaches all of the features of the rejected claims. Specifically, it was alleged that Angwin teaches a "data recognizer that differentiates the voice data from the non-voice data" on page 8, lines 38-43, and "a controller" for switching between two internet protocols, "according to the differentiation by the data recognizer" (page 8, lines 38-43, and page 14, lines 1-23).

Applicants do not believe that Angwin teaches these limitations, found in claims 1, 22, 31, and 32. Angwin teaches a mobile communication system that transmits IP-based voice packets and control data over a single circuit-switched connection. Angwin discusses the use of an Interworking Function (IWF) which "converts between the data transfer protocols of fixed telephone lines and of wireless communications" (Angwin, page 8, lines 39-40). The IWF referenced in Angwin does not "differentiate" different types of data, i.e., voice data from non-voice data. It simply converts voice packets from "telephone lines" to a format suitable for over-the-air transmission to a wireless telephone. Applicants believe that this distinction alone renders Angwin unable to sustain a rejection under 35 U.S.C. 102.

In addition, Applicants believe that Angwin does not teach a controller for switching between two internet protocols. The section cited in the office action mentions nothing about switching between two internet protocols, let alone performing the switching based on results from the "data recognizer". Applicants can find nothing in Angwin that include the features found in Applicants' claims.

Therefore, Applicants respectfully request the rejections to the independent claims, and their dependent claims, be withdrawn.

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Rejections under 35 U.S.C. 103

Claims 7 and 34 were rejected under 35 U.S.C. 103(a) as being unpatentable over Angwin, in view of Brachman et al. (US Patent No. 6,704,576). It was alleged that Angwin teaches all of the limitations of these claims, but for the feature of a user entering a verbal command into a mobile device. It was further alleged that Brachman teaches such a feature and that the combination of the two references would render Applicants' claims obvious.

As explained above, Applicants do not believe that Angwin teaches several features of independent claims 1, 22, 31, and 32. Therefore, Applicants do not believe that the combination of Angwin and Brachman could render these claims obvious.

Conclusion

All of the claim rejections have been traversed, accommodated, or rendered moot. Applicant, therefore, respectfully requests that all current rejections and objections be withdrawn, and that all present claims be allowed. Applicant believes that a complete response has been made to the outstanding office action. If the examiner believes that a personal communication is needed to resolve any outstanding issues, the examiner is invited to call the attorney at the telephone number provided below. If there are any fees due in connection with the filing of this response, please charge such fees to our Deposit Account No. 17-0026. If a fee is required for an extension of time under 37 C.F.R. 1.136 not accounted for, such an extension is requested and the fee should also be charged to our Deposit Account. A duplicate copy of this page is enclosed.

Respectfully submitted,

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